

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ABBOTT GMBH & CO., KG,	)	
ABBOTT BIORESEARCH CENTER, INC.,	)	C.A. No. 4:09-CV-11340 (FDS)
AND ABBOTT BIOTECHNOLOGY LTD.,	)	
	)	
Plaintiffs,	)	JURY TRIAL DEMANDED
	)	
v.	)	
	)	
CENTOCOR ORTHO BIOTECH, INC. AND	)	
CENTOCOR BIOLOGICS, LLC,	)	
	)	
Defendant.	)	

**CENTOCOR'S OBJECTIONS TO ABBOTT'S UPDATED EXHIBIT LIST**

The Centocor Defendants hereby lodge the following objections to Abbott's witness list as of August 29, 2012.

**A. Witnesses That Abbott May Call at Trial**

1. Brian Dawson, Abbott Laboratories, 200 Abbott Park Road, Abbott Park, IL 60064, as a fact witness relating to the issue of damages. Centocor objects to Mr. Dawson testifying at trial for the reasons explained in Centocor's Motion in Limine No. 1 (D.I. Nos. 381, 407, and 425).
2. Joan Ellis, Ph.D., 1875 Eye Street, NW, Suite 1200, Washington, DC 20006, (202) 659-6929, as an expert witness subject to the Court's order granting in part and denying in part Centocor's Daubert Motion, on August 13, 2012. Centocor objects to Dr. Ellis testifying at trial for the reasons explained in Centocor's Motion in Limine No. 12 (D.I. Nos. 381, 407, and 425).
3. Prashant Patel, Abbott Laboratories, 200 Abbott Park Road, as a fact witness relating to the issue of damages. Centocor objects to Mr. Patel testifying at trial for the reasons explained in Centocor's Motion in Limine No. 1 (D.I. Nos. 381, 407, and 425).

**B. Witness Testimony That Abbott Will Present Through Deposition Designation**

1. Jill Giles-Komar, 145 King of Prussia Road, Radnor, PA 19087, as a fact witness on Centocor's invention. Centocor objects to Abbott presenting testimony from Ms. Giles-Komar through deposition designations as Ms. Giles-Komar will be testifying live at trial.

2. Kimberly C. Staquet, 145 King of Prussia Road, Radnor, PA 19087, as a fact witness on Centocor's invention. Centocor objects to Abbott presenting testimony from Ms. Staquet through deposition designations as Ms. Staquet will be testifying live at trial.
3. Raymond W. Sweet, Ph.D., 145 King of Prussia Road, Radnor, PA 19087, as a fact witness on the issues of validity and willfulness. Centocor objects to Abbott presenting deposition testimony from Dr. Sweet as irrelevant and pursuant to Federal Rule of Evidence 403.

Dated: August 29, 2012

CENTOCOR ORTHO BIOTECH, INC.,

By its attorneys,

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**CERTIFICATE OF SERVICE**

I certify that, on August 29, 2012, this document (filed through the ECF system) was sent electronically to the following persons:

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